

Enclosure 1

CALFED Bay-Delta Program
Draft Programmatic EIS/EIR and Technical Appendices
Specific Comments

Draft PEIS/EIR**Section 6.1.3.6 Mitigation Strategies**

This section identifies only mitigation measures that would be associated with construction. No mitigation measures are discussed for long-term impacts associated with program operation. For example, increases in salinity under Alternative 1 due to increased Delta pumping are identified as being significant, however, no mitigation measures or strategies are identified or discussed in the mitigation section.

Another example of where mitigation measures are not adequately addressed is contained on page 6.1-60 where there is a discussion of the impacts to drinking water quality from increased dissolved organic carbon (DOC) as a result of conversion of agricultural land to aquatic habitat under the Ecosystem Restoration Program. A few mitigation measure are mentioned in the discussion, but Section 6.1.3.6, the section on mitigation strategies, contains no identification or analysis of such measures. Section 6.1.3.6 should be expanded in the Revised Draft PEIS/EIR to address all potential mitigation measures that have been identified in the Draft PEIS/EIR or by commentors on Draft PEIS/EIR.

Section 6.1.3.4, Comparison of Program Alternatives to the No Action Alternative
The discussion of water quality impacts of alternatives on SWP-CVP Service Areas Outside the Central Valley is very limited and inadequate. The document refers to similar impacts that are discussed in the Delta Region subsection; however the bromide, total organic carbon (TOC), and TDS levels of source water are not quantified. In addition, on occasions where percentage changes are stated for salinity, the discussion fails to identify the change in the overall variability of the salinity of the supply. For example, Figures 6.1.3-1 and 6.1.3-2 appear to show average values for each month under each alternative, but not values which would be representative of the variability for the months. The Revised Draft PEIS/EIR needs to identify the magnitude of a water quality parameter as well as a measure of its overall variability. This can be accomplished by presenting the 10%, 25%, 50%, 75%, 90% probability of exceedence values as well as the minimum and maximum values for the parameters of concern--bromide, TOC, and TDS. This information needs to be presented in the Revised Draft PEIS/EIR for the quality of water delivered to the SWP-CVP Service Areas Outside the Central Valley.

Page 6.1-56, Comparison of No Action Alternative to Existing Conditions

The Draft PEIS/EIR describes the change in water quality conditions in the Delta as a result of the No Action Alternative. There are references to percentage increases in

pollutant loads and to the percentage increase in salinity at the SWP and CVP export location; however, the absolute values of predicted changes are not presented or discussed. As a result, no comparison to water quality parameter targets identified in the CALFED Water Quality Common Program can be made. Further, there is no identification of the variability of levels for the parameters of concern. The Revised Draft PEIS/EIR needs to present the range (10%, 25%, 50%, 75%, and 90% probability of exceedence values) of projected water quality values for the parameters of concern (bromide, TOC, and TDS).

Section 6.1.3.4, Comparison of Program Alternatives to No Action Alternative
See comment on Comparison of No Action Alternative to Existing Conditions.
Page 6.1-57. The Draft PEIS/EIR states that, "Releases from storage could reduce salinity at the Contra Costa Canal Intake during dry years." This appears to be a mitigation measure for the potentially significant impact mentioned in the previous paragraph. However, the discussion of mitigation strategies in Section 6.1.3.6 contains no mention or reference to this proposed action. Further, neither discussion identifies the environmental effect of taking such an action (i.e. reduced water storage or water supplies for the SWP, CVP, or others). Mitigation measure such as these need to be more clearly identified and analyzed in the Revised Draft PEIS/EIR.

Page 6.1-58. Figures 6.1.3-1 and 6.1.3-2 compare TDS levels at Rock Slough and Prisoner's Point among the various CALFED alternatives. The Revised Draft PEIS/EIR should present similar information for Clifton Court Forebay so that changes in salinity levels for SWP deliveries can be addressed. In addition, these figures should characterize the change in variability of TDS by showing a fuller range of representative data (10 percent, 25 percent, 50 percent, 75 percent, and 90 percent exceedence values).

Page 6.1-59. The Draft PEIS/EIR states that, "Alternative 3 would result in reductions in salinity, DOC, and bromide in export water". However, no quantified data is shown that would enable an appropriate comparison of the alternatives. The Revised Draft PEIS/EIR needs to quantify such reductions. (See comment regarding Comparison of No Action Alternative to Existing Conditions.)

Page 6.1-67, SWP-CVP Service Areas Outside the Central Valley
This section does not adequately address the effects of the various CALFED alternatives on water quality for these areas, particularly for Metropolitan. This section should be expanded to identify how the various CALFED alternatives will affect quality of Delta water delivered to these regions (see comment regarding Comparison of No Action Alternative to Existing Conditions). This section should also be expanded to discuss how the changes in source water quality would impact the ability to meet drinking water standards and how salinity changes impact local water management programs.

Page 6.1-73, Environmental Consequences: Water Supply And Water Management
For the San Joaquin River Region a statement is made that "...higher quality water requires less blending, there are fewer losses due to treatment, and it can be applied to

more beneficial uses than poorer quality water." This point also pertains to the SWP and CVP Service Areas Outside the Central Valley (in particular, it is a considerable issue relating to Metropolitan); however, there is not a consistent reference to this fact in all the applicable regions discussed in the Draft PEIS/EIR, nor is it adequately discussed in Section 6.1.3 Environmental Consequence: Water Quality.

Chapter 6.2, Groundwater Resources.

The discussion of groundwater resources very generally analyzes assumed groundwater storage programs of 250 TAF in the Sacramento Valley and 500 TAF in the San Joaquin Valley. Unfortunately, the description of these groundwater storage programs is too general for a reader to determine whether certain areas where such programs are feasible are covered in the analysis. For example, the Ag-Urban Water Caucuses has identified potential conjunctive use storage projects east of the Delta involving the Mokelumne, Calaveras, Stanislaus and Farmington basins, which have the potential to generate water supply benefits for local water users and dry year yield for others, and to increase environmental flows for fishery requirements in east side tributaries. Local interests are currently pursuing these opportunities, which could be available for early implementation (1 to 3 years). It does not appear that the potential use of these east of Delta basins has been considered.

Additionally, the Ag-Urban Water Caucuses has identified groundwater storage opportunities in export areas such as Kern County and the Madera Ranch, which could provide storage capacity of more than a million acre-feet. While the Draft PEIS/EIR does assume 500 TAF of groundwater storage in the San Joaquin Valley, whether the analysis is adequate to encompass the areas or amounts identified by the Ag-Urban Water Caucuses is unclear.

CALFED should ensure that its Revised Draft PEIS/EIR contains analyses of these groundwater storage opportunities sufficient to support their implementation as appropriate.

Section 7.1.2.5 Comparison of Program Alternatives to No Action Alternative

The Draft PEIS/EIR does not discuss the potential adverse effects of water use efficiency measures on the incidental benefits of discharged water that have accrued to aquatic and riparian habitats and dependent species in export area waterways. In the arid export areas, most stream and river courses flow intermittently, and their baseflows may be significantly extended by urban runoff and wastewater discharges. The Revised Draft PEIS/EIR needs to disclose and address the potential loss of aquatic and riparian habitat and adverse impacts to associated candidate, threatened, and endangered species that can result from significant reductions in such additions to stream and river baseflows. Protected species potentially affected include the least Bell's vireo, southwestern willow flycatcher, yellow-billed cuckoo, unarmored three-spine stickleback, and the West coast steelhead. There are potentially significant tradeoffs represented here that need to be balanced in the CALFED Program.

Section 8.2.3 Environmental Consequences: Urban Water Supply Economics

It is stated on page 8.2-32 that, "DWR has provided a preliminary least-cost planning analysis for the South Coast region". This analysis was used to estimate the value of imported water. No information is provided that would enable a comparison between this least-cost planning analysis and Metropolitan's Integrated Resources Plan (IRP). DWR's assumptions regarding water development for Metropolitan's service area may be considerably different than actual planning efforts. The Revised Draft PEIS/EIR should identify the assumptions used to conduct the least-cost planning analyses. These assumptions need to be consistent with Metropolitan's IRP.

This section makes inconsistent references to the region in which Metropolitan is located as: the SWP and CVP Service Areas outside the Central Valley region, the SWP South of Kern County region, and the South Coast region. For example, the analysis of water quality impacts refers to Table 8.2.3-3, which refers to the SWP South of Kern County region and Table 8.2.3-4 which refers to the South Coast region. This section of Revised Draft PEIS/EIR should be consistent with others sections of the document and analyze the SWP and CVP Service Areas outside the Central Valley region.

This section contains analyses that estimate the economic effects due to changes in salinity levels delivered to urban customers. A model that was developed by the USBR in 1988, and updated and improved by USBR and Metropolitan in 1997, was used to estimate such economic impacts. Metropolitan provided this model to CALFED along with some of the input parameters for our service area. For CALFED's use of the model, it appears that assumptions regarding Metropolitan's SWP supply utilization, the region's overall water resource mix source, and Metropolitan's treatment plant effluent TDS values were used that may not be entirely appropriate for such an analysis. In addition, the model has been recently updated to reflect new information regarding the relationship between salinity impacts and the use of bottled water and water softeners. Metropolitan would like to work with CALFED's staff and consultants so that a revised analysis of economic impacts associated with salinity can be made using the most updated model and appropriate input values. Such a revised analysis should be included in the Revised Draft EIR/EIS.

Table 8.2.3.4. On page 8.2-35 references are made to salinity levels at Clifton Court Forebay and Rock Slough. The document states that results are provided in Table 8.2.3.4; however, only Clifton Court TDS levels are shown. Further it is unclear why the "SCR Delivery" is shown in Table 8.2.3.4. These delivery values appear to be incorrect, are not relevant, and should be deleted.

Page 8.2-36. The Draft PEIS/EIR states that a model obtained from Metropolitan included all of the data to run the model for the South Coast region. This statement should be corrected to state that the model included data to run the model for the Metropolitan's service area. Data for the remainder of the SWP and CVP Service Areas outside the Central Valley region was obtained by CALFED from other sources such as Bulletin 160-93. In addition, the Revised Draft PEIS/EIR should clarify that the model was initially developed by the USBR in 1988 to estimate the economic damages due to

high salinity on a variety of uses including agriculture, municipal, and industrial uses. In 1997, USBR and Metropolitan updated the model to make it more appropriate for current use.

Page 8.2-37. The Draft PEIS/EIR states that "For water quality impacts, a reduction in TDS of Delta export water is considered beneficial if it is more than 20% of the No Action concentration and adverse if the increase is more than 20% of the No Action concentration". This determination is inconsistent with the analyses contain in Section 6.1.3 Environmental Consequence: Water Quality. Section 6.1.3 states that increases in salinity on the order of 10% or more are considered to be a potentially significant impact. Recognizing that Metropolitan's State Water Service Contract contains 220 mg/L TDS objective and that SWP water has exceeded this objective in recent history, a 10% change in SWP TDS levels is a more appropriate significance criterion. The Revised Draft PEIS/EIR needs to be revised to reflect the 10% significance criterion.

Section 8.5, Power Production and Energy

Page 8.5-2. The identifiers in the table needs to show an increased level of impact. The DWR/SWP impacts identified in the table appear to be minimal but results discussed later in the section are showing +18%, +6% and +16% impacts to system energy rates which are considerable for Alts 1,2 and 3 respectively.

Page 8.5-9. A system energy rate for the CVP assuming a year 2020 was listed as 21.59 mills/kWh for the No Action Alternative, and on page 8.5-6 the current composite power value is \$20.6 /MWh. The document needs to specify a value for the SWP No Action Alternative, since an existing system energy rate is 23.8 mills/kWh is given on page 8.5-6.

Section 8.5.1.2.

Page 8.5-2 describes the SWP's net energy requirement before considering off-aqueduct power resources as the appropriate assessment variable to measure. However, the next paragraph lists DWR's existing system energy rate is 23.8 mills per kilowatt hour, which may exclude off-aqueduct resources and sales which may offset each other, however this value appears to include off-aqueduct power charges and should be clarified. DWR's variable net energy rate before considering DWR's off-aqueduct power charges is typically less than half of the 23.8 mills/kwh listed. For example as published by DWR's State Water Project Analysis Office on March 12, 1998, for actual year 1997, DWR's system energy rate was only 9.61 mills per kilowatt-hours, which corresponds to a system energy rate of 23.24 mills per kilowatt-hours including off-aqueduct payments.

Suggested Correction:

If the proper net energy requirement did exclude off-aqueduct resources and costs, which was used in the assessment and the impacts to off-aqueduct charges was simply an add-on, simply clarify the last sentence preceding section 8.5.2 to read as follows: DWR's existing system energy rate including off-aqueduct power charges is 23.8 mills per kilowatt hour. (Otherwise a reader may interpret the DWR's variable system energy rate for 1987 of 9.61 mills/kwh would increase to 26.69 for the No Action alternative (Table 8.5.2-2)

and not include the off-aqueduct charges which would make it even larger.) It is also recommended to clarify, if valid of course, that the effects of off-aqueduct energy and charges were assumed constant for this analysis or that any increase in off-aqueduct energy requirements was assumed to be offset by an equivalent amount of increased off-aqueduct sales if that was the case.

Section 8.5.2.4

The potential for increased costs to the SWP Contractors/DWR water users was not adequately addressed in the power production and energy sections of the Draft PEIS/EIR. Although Section 8.5.2.4 states that "the significance of the potential impact on SWP water charges is addressed in Section 8.6," Section 8.6 does not in fact address the impacts to Southern California DWR water customers. The impacts to DWR water users was really only mentioned, but not quantified, even in the "Draft CALFED Technical Report—Affected Environment - Power Production and Energy, March 1998 (Technical Report). In fact, it appears that many of these costs could be shifted onto DWR water users. Based on the forecasts made in the Technical Report, any additional power purchases or generation required to meet additional pumping requirements would increase the DWR system energy rate, which would directly impact the SWP Contractors/DWR water users. Section 8.5.2.4 of the Revised Draft PEIS/EIR should quantify, to the extent possible, the increased pumping required by the alternatives, the resultant range of power costs (using the rates in Table 2 of the Technical Report), the financial impacts to the DWR water customers, as well as the beneficiaries potentially liable for the increased charges.

Page 8.6-1. Page 8.6-1 contains a sidebar that discusses impacts to regional economics. This discussion should be modified to recognize the impacts of CALFED's Storage and Conveyance Alternative on the ability to treat Delta water to meet drinking water standards. This sidebar should also include a discussion of CALFED's Water Quality Common Program.

Page 8.6-12. The Draft PEIS/EIR states that M&I water users could realize up to \$2.6 million in annual savings from improved water quality and supply from the Ecosystem Restoration Program (ERP). However, it is unclear what water quality and supply benefits will be realized from the ERP. This needs to be clarified in the Revised Draft PEIS/EIR.

In the section on the Water Quality Program, benefits of the storage and conveyance facilities are discussed. The economic benefits presented in the section are misleading and should be moved to a section that discusses water storage and conveyance facilities.

Page 8.6-15. The section discussing the environmental consequence of region economics for the SWP and CVP Service Areas outside the Central Valley region is inadequate and lacking in detail compared to the other regions discussed in the Draft PEIS/EIR. This section should consider the economic consequences of each alternative on increased water

supply, improved ability to meet drinking water quality requirements, and increased ability to maximize local resources.

Water Quality Program Technical Appendix

Page 4. The term "beneficial use" is used inappropriately, on this page and on pages 7 and 49 of the Water Quality Program Technical Appendix, to refer to the urban, agricultural and ecosystem stakeholder groups. Urban, agriculture and ecosystem are not beneficial uses, rather they are categories of stakeholder interests. Each of these groups is concerned about and interested in the protection of one or more beneficial uses. The document needs to be revised, where appropriate, to distinguish between beneficial uses that are the subject of the CALFED Water Quality Program (e.g., municipal water supply, agricultural water supply, recreation, fisheries, etc.), and the interests or concerns of the urban, agricultural and ecosystem subteams or stakeholder groups. For example, the last sentence in the first paragraph on page 4 could be revised to read as follows: "The teams met separately for several months to identify parameters of concern for the beneficial uses of interest to them and to formulate actions to address the parameters."

Page 4. In the description of the Phase I stakeholder involvement process for the Water Quality Program, it is stated that the urban, agricultural and ecosystem subteams each identified parameters of concern to their respective beneficial uses based upon available data and technical knowledge, and "... based on a set of criteria." However, the criteria used to identify parameters of concern are not described. The document needs to be revised to include a description of the criteria each subteam utilized in their efforts to identify water quality parameters of concern. This information is needed in order to provide the reader with a complete description of the Phase I Water Quality Program activities.

Page 7. The discussion about parameters of concern needs to be revised to include the most recent recommendations of the Parameter Assessment Team and the Water Quality Technical Group regarding additional parameters of concern and potential parameters of concern.

Page 7. The last paragraph needs to be revised to reflect the fact that not all water quality problems associated with the parameters of concern are identified on Clean Water Act section 303(d) lists of impaired water bodies, which are prepared by the Regional Water Quality Control Boards. Parameters of concern are included on section 303(d) lists in those cases where the occurrence of the parameter is thought to be responsible for the violation of an existing numerical or narrative water quality objective. The disinfection by-product precursor parameters of concern, which are of interest to urban water suppliers, do not have water quality objectives. As a result, water quality problems associated with these parameters are not identified on section 303(d) lists of impaired water bodies.

Page 8. Table 1 needs to be revised to incorporate the most recent recommendations of the Parameter Assessment Team and the Water Quality Technical Group regarding additional parameters of concern and potential parameters of concern.

Page 8. The document states that CALFED anticipates that a great deal of water quality information throughout the geographic scope of the program will be compiled by the Comprehensive Monitoring, Assessment, and Research Plan (CMARP); however, no information about CMARP is provided or referenced. We request that CALFED include detailed information on the purpose and role of CMARP in the Revised Draft PEIS/EIR.

We believe that a comprehensive monitoring and research program, such as CMARP, designed to provide an increased understanding of water quality problems and to document the progress and success of source control actions, is an essential component of the Water Quality Program. Despite years of study, many water quality problems are not yet properly understood and the relationship between in-stream biological effects and water quality standards exceedances or toxicity test results using standard bioassays is poorly understood. We understand it is difficult and may not be cost effective to take action prior to understanding the water quality problems of the Delta and its tributaries; however, CALFED needs to find the proper balance between monitoring and taking action. We urge CALFED to substantively involve the interested stakeholders in the development of the details for CMARP.

Page 10. The discussion in paragraph 3 regarding numerical water quality objectives for drinking water sources is misleading and needs to be revised. It should be revised to reflect the fact that the existing numerical water quality objectives applicable to water bodies designated as drinking water supplies do not cover all of the parameters of concern to urban water suppliers using the Delta as a source of supply (i.e., bromide, total organic carbon (TOC), salinity, pathogens, nutrients and turbidity). For the parameters of concern to drinking water suppliers, it is necessary to consider such factors as future likely regulatory scenarios, emerging health effects information, treatment feasibility and cost, and water resource management issues in the development of appropriate source water quality target levels.

For some water quality parameters, like metals and pesticides, there are federal and state drinking water standards (maximum contaminant levels or MCLs) that are applicable to treated drinking water. In these cases it is appropriate to use the drinking water standard as a measure of success in efforts to address drinking water beneficial use impairments. However, for the parameters of concern to urban water suppliers, there are no drinking water standards that are appropriate to use as source water quality target levels. For example, there are no standards for the disinfection by-product precursor parameters (bromide and TOC); rather, there are drinking water standards for disinfection by-products, which are compounds formed in drinking water as a result of disinfectants combining with bromide and TOC. For other drinking water parameters, such as pathogens and turbidity, there are drinking water treatment requirements that are based on source water quality characteristics. In addition, for salinity and nutrients, the existing

MCLs for TDS and nitrate are not sufficiently protective of source water quality, because they do not take into consideration resource management and reservoir management issues. These issues regarding appropriate source water quality target levels for drinking water supplies are considered in more detail elsewhere in this comment package.

Page 11. Description of Water Quality Actions: We support CALFED's recent efforts to organize the Water Quality Technical Group into smaller working teams to develop details for the water quality actions contained in the Water Quality Program Technical Appendix and develop a prioritization and implementation strategy for the Water Quality Program. We recognize the importance of this endeavor and urge CALFED to provide sufficient guidance and commitment of resources to ensure the success of this effort.

We also recognize that as an outcome of this effort, many of the water quality actions are likely to be revised substantially, and we expect that CALFED will release the revised Water Quality Program for another period of public review and comment with the Revised Draft PEIS/EIR. At this time we are providing comments on the water quality actions as published in the March 1998 Water Quality Program Technical Appendix, and we look forward to continuing to work with CALFED on the refinement of the water quality actions.

Page 11. Mine Drainage: Action 1

In recent years, the Regional Boards have been reluctant to commit public funds on mine abatement projects due to the concern that the State would become liable for clean up costs. The California Water Code has been amended to allow "good Samaritans" to become involved in mine abatement and to avoid liability. The federal Clean Water Act has not been amended to allow state agencies and others to pursue mine abatement while avoiding liability associated with such efforts. We recommend that the implementation strategy addressing mine drainage include efforts to pursue these needed amendments to the federal Clean Water Act.

Page 14. Urban and Industrial Runoff: Action 1

The methods for addressing beneficial use impairments associated with copper, zinc and cadmium from urban and industrial runoff include "Enforce existing source control regulations." This is also listed as a method under other water quality actions. We believe strongly that existing water quality control regulations should be enforced; however, we do not feel that this is an effective method for CALFED water quality actions. The water quality actions need to be revised to recognize those instances where water quality problems persist despite the existence of source control regulations, and to include methods that supplement and enhance existing source control regulatory programs in order to achieve Water Quality Program goals. If there are indications that existing regulations are not being enforced, CALFED should provide a description of the problem and make specific recommendations to the regulatory agencies regarding areas where improved enforcement would help improve the Bay-Delta ecosystem. The first method listed under Urban and Industrial Runoff, Action 1, should be revised to read as follows:

"Provide financial and technical assistance to municipal and industrial stormwater programs for improved implementation of existing source control requirements."

Page 15. Urban and Industrial Runoff: Action 3

The methods for addressing beneficial use impairments in the Delta Region from low dissolved oxygen levels caused by nutrient loadings include enforcement of existing source control regulations. Please see the above comment for page 14.

Page 16. Urban and Industrial Runoff: Action 5

The bullet item under Research/Monitoring, which reads "Improved understanding of the sources of TOC, salinity, and pathogens in the Delta Region and its watersheds", needs to be moved to the Performance Measures section.

Page 19. Wastewater and Industrial Discharge: Action 5

The bullet item under Research/Monitoring, which reads "Improved understanding of the sources of TOC, salinity, and pathogens in the Delta Region and its tributaries", needs to be moved to the Performance Measures section.

Page 20. Agricultural Drainage and Runoff: Action 1: Research/Monitoring

The evaluation of the feasibility of treatment options should include demonstration scale testing of promising treatment options.

Page 20. Agricultural Drainage and Runoff: Action 1: Methods

Methods to reduce drainage flows through increased water use efficiency should include the operation of district and on-farm water and drainage management systems.

Page 21. Agricultural Drainage and Runoff: Action 2

Action 2 should be revised to read as follows:

"Reduce the impairment of drinking water and agricultural beneficial uses within the Delta Region due to salinity, through source control and treatment of agricultural surface and subsurface drainage in the San Joaquin River Region."

Page 21. Agricultural Drainage and Runoff: Action 2: Methods

The fourth item in this section should be revised to include a discussion of real-time monitoring. Real-time monitoring is needed to time discharges to coincide with periods of high river flow and low in-river salinity concentrations so that water quality objectives are not exceeded in receiving waters. This method can potentially result in lower salinity concentrations in the San Joaquin River at certain times but it will not likely reduce the total salinity load.

Page 21. Agricultural Drainage and Runoff: Action 3

In order to adequately protect environmental beneficial uses, pesticide-related impacts must be addressed in the regions that are tributary to the Delta Region. The Action 3 statement needs to be revised to read as follows:

"Reduce the impairment of environmental beneficial uses in the Delta, Sacramento River and San Joaquin River Regions associated with the pesticides carbofuran, chlorpyrifos and diazinon, through agricultural runoff source control measures."

Page 22. Agricultural Drainage and Runoff: Action 3: Indicators of Success

The first bullet item in this section needs to be revised to read as follows:

"No likely significant toxicity from carbofuran, chlorpyrifos and diazinon in the Delta, Sacramento River and San Joaquin River Regions."

The second bullet item in this section needs to be revised to read as follows:

"Indicate through toxicity identification evaluation (TIE) testing that carbofuran, chlorpyrifos and diazinon are not a significant cause of toxicity in the Delta Region and its tributaries."

Page 22. Agricultural Drainage and Runoff: Action 4

The Action 4 statement needs to be revised to read as follows:

"Reduce the impairment of environmental and drinking water beneficial uses in the Delta Region and its tributaries associated with sediment loading and subsequent turbidity, through agricultural runoff control measures."

Page 23. Agricultural Drainage and Runoff: Action 5

A Research/Monitoring section should be added to this action, and the following bullet item should be included:

- **"Evaluate the feasibility of treating Delta Island agricultural drainage to remove TOC, through pilot scale testing."**

Page 23. Agricultural Drainage and Runoff: Action 6

Drinking water supplies are impacted by excessive nutrient levels. Nutrients are a critical reservoir management issue because nutrient levels are a determining factor governing the growth of taste-and-odor producing algae in water storage reservoirs. The action statement needs to be revised to read as follows:

"Reduce the impairment of environmental, recreational and drinking water beneficial uses in the Delta Region and its tributaries associated with nutrients and ammonia through source control of agricultural surface drainage."

Page 23. Agricultural Drainage and Runoff: Action 6: Research/Monitoring

The first bullet item needs to be revised to include evaluation of sources, mass loadings and effects of nutrients, ammonia and dairy wastes discharged in the Delta, San Joaquin River and Sacramento River Regions.

Page 24. Agricultural Drainage and Runoff: Action 6: Indicators of Success

The following additional indicator of success needs to be included in this section:

"No drinking water beneficial use impairment caused by excessive taste-and-odor producing algae growth in water storage facilities for drinking water supplies exported from the Delta."

Page 24. Water Treatment: Action 1

This action addresses drinking water quality issues with incentives for upgrading drinking water treatment plants to more advanced treatment. Metropolitan opposes reliance on treatment alone to address water quality concerns for drinking water supplies, and we request that this action be revised to indicate that CALFED does not intend to emphasize treatment as a sole means to address drinking water quality concerns. Reliance on treatment alone to address drinking water quality issues is not sufficiently protective of public health and is not consistent with EPA's source water protection programs. Source water quality protection or selection must be a central component of any CALFED Bay-Delta solution, and the Water Quality Program must include source control actions addressing each of the drinking water quality parameters of concern, where it is feasible to do so.

In addition, many urban drinking water suppliers utilizing water supplies from the Delta have already upgraded or are making plans to upgrade their treatment plants to include ozone or enhanced coagulation. Metropolitan is moving forward with plans to install ozone at its two filtration plants that treat drinking water supplies exported from the Delta. It is also doing studies to evaluate the effectiveness of enhanced coagulation. Installation of granular activated carbon (GAC) and/or membrane filtration is not economically feasible, and these treatment technologies have significant associated environmental impacts, such as siting of GAC regeneration facilities and wasting 15 to 25% of the water supply in the concentrated brine when using reverse osmosis membranes.

Page 25. Water Treatment: Action 1: Performance Measure

The performance measure listed is incorrect and needs to be deleted. In those cases where drinking water quality concerns are addressed by upgrading drinking water treatment plants to more advanced treatment, the quality of the water at the drinking water intake will not change and decreased detection of drinking water parameters of concern would not be expected.

Page 25. Water Treatment: Action 2

This action is very broad in scope compared to the other actions, and it addresses issues outside the scope of the Water Quality Program (i.e., relocation of water supply intakes). It essentially encompasses all of the source control actions addressing drinking water parameters of concern, and it also appears to be an attempt to address drinking water quality concerns through a combination of source control actions and implementation of a storage and conveyance alternative that results in relocation of water supply intakes. Metropolitan agrees with CALFED on the need to comprehensively evaluate, as part of the PEIS/EIR, the combined effectiveness of source control actions and implementation of storage and conveyance alternatives to achieve good quality drinking water supplies.

Page 25. Water Management: Action 1

This action addresses beneficial use impairments due to salinity, and proposes to achieve water quality improvements through a combination of water use efficiency measures, water transfers, and storage and conveyance facilities alternatives. While we agree with CALFED on the need to evaluate the combined effects of common program actions and storage and conveyance alternatives on the ability to achieve Water Quality Program objectives, this action does not appear to fit well with the other Water Quality Program actions. CALFED may want to consider moving this item to a section of the PEIS/EIR concerning the combined effects of common program elements and the storage and conveyance alternatives.

Page 27. Human Health: Action 1: Methods

The first method for this action includes enforcement of existing source control regulations. Please see the above comment for page 14.

In the third paragraph of the Methods section, "California Department of Public Health" needs to be corrected to read "California Department of Health Services".

Page 35. Table 4. Potential Tools and Indicators of Success for Assessing the Effectiveness of CALFED Water Quality Actions

The discussion concerning the Water Quality Objectives tool needs to be revised to reflect the fact that the existing numerical water quality objectives applicable to water bodies designated as drinking water supplies do not cover all of the parameters of concern to urban water suppliers using the Delta as a source of supply (i.e., bromide, total organic carbon (TOC), salinity, pathogens, nutrients and turbidity). Please see the comment above for page 10.

Page 38. Table 5. CALFED Water Quality Targets for Parameters of Concern

Table 5 needs to be revised to include the most recent recommendations of the Parameter Assessment Team and the Water Quality Technical Group regarding additional parameters of concern and water quality target levels.

Page 42. Table 5. CALFED Water Quality Targets for Parameters of Concern

Metropolitan recommends that the water quality target levels for bromide and TOC, which are applicable to drinking water sources in the Delta Region, be set at 50 µg/L and 3 mg/L, respectively. We believe these target levels are appropriate as desirable in-stream concentrations, for purposes of long-term planning and evaluating the impacts of the CALFED alternatives on source water quality for drinking water supplies. Please refer to comments on the Phase II Interim Report, concerning the implications of the Delta conveyance decision on export water quality.

Page 43. Table 5. CALFED Water Quality Targets for Parameters of Concern

Metropolitan requests that the discussion in Table 5 concerning nutrients (nitrate) be revised to reflect the fact that the nitrate MCL of 10 mg/L is not appropriate to use as a desirable in-stream concentration that provides water quality protection for surface water drinking water supplies. Implementation of the 10 mg/L nitrate MCL as a target level

for in-stream concentrations would result in significant degradation of water quality. Nutrients are a critical reservoir management issue, and nutrient levels are a determining factor governing the growth of taste-and-odor producing algae in water storage reservoirs.

We request that Table 5 be revised to include the following two narrative target levels for nutrients in the Delta Region:

- No increase in nitrate levels
- Decrease in phosphorus levels

Page 50. Strategies for Phased Implementation

Metropolitan agrees with the four cornerstones that are presented for the process that will be used to determine specific water quality strategies and actions. We urge CALFED to provide sufficient guidance and to commit adequate resources to ensure the success of the effort to develop implementation strategies for the Water Quality Program actions.

Page 53. Strategies for Phased Implementation: Agricultural Drainage and Runoff

In order to adequately protect environmental beneficial uses, pesticide-related impacts must be addressed in the regions that are tributary to the Delta Region. The third bullet item in this section needs to be revised to read as follows:

- "Reducing pesticide-caused toxicity in the Delta, Sacramento River and San Joaquin River Regions"

Page 54. Strategies for Phased Implementation: Human Health

"Department of Public Health" should be corrected to read "Department of Health Services".

Water Use Efficiency Component Technical Appendix

Page 5-51. Table 5.8 displays Conservation Cost Estimates (in dollars/acre-foot/year) for various measures implemented by customers. The table states that the annual cost for a residential water audit equals that for a residential or commercial ULFT. This defies logic, in that residential audits may be required on a continuing basis in order to maintain the claimed water savings (since assured savings are not readily identifiable or quantifiable) whereas an installed ULFT does not require on going "maintenance" over its lifetime of the magnitude that is required of an audit. Thus, the annual cost of the ULFT measure should be significantly less than that of a water audit.

Long-Term Levee Protection Plan Technical Appendix

Page B-2 states that Federal, State, and local agencies should be able to pay their share of costs for levee reconstruction to selected levee standards. However, CALFED fails to recommend an "ability to pay" study for the local agencies. Reclamation districts potential

revenues, assessment sources, and land use are highly variable. For example, islands with existing utilities benefitting from island resources may be required to pay a different percentage of the overall costs due to the added benefits of land use. For these reasons, an "ability to pay" assessment is needed. The existing ability to pay study completed for DWR's Special Flood Control Project Program could be used as a template.